

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AVANGRID NETWORKS, INC., and  
AVANGRID SERVICE COMPANY,

Plaintiffs,

- v. -

SECURITY LIMITS, INC. and PAULO SILVA,

Defendants.

Case No. 22 Civ. 9622 (AT)

**DECLARATION OF JOSEPH M. SANDERSON IN SUPPORT OF PLAINTIFFS’  
MOTION TO DISQUALIFY BRADFORD, EDWARDS & VARLACK LLP AS  
COUNSEL TO DEFENDANTS**

JOSEPH M. SANDERSON, pursuant to 28 U.S.C. § 1746, declares and states as follows:

1. I am an Associate at the law firm of Steptoe & Johnson LLP and counsel for Plaintiffs in this action. I submit this Declaration to place before the court certain publicly-available documents that are relevant to the Motion to Disqualify.
2. Attached hereto as **Exhibit 1** is a true and correct copy of an American Lawyer article entitled “‘We Decided to Create Change’: 3 Ex-Big Law Vets Launch New Black-Owned Firm,” as downloaded from LexisNexis’s archive.
3. Attached hereto as **Exhibit 2** is a true and correct copy of a press release entitled “Bradford Edwards & Varlack LLP Welcomes Two New Counsel, Adding Litigation and Transactional Lawyers,” as downloaded from <https://bradfordedwards.com/press-release-103122/>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a press release entitled “John Kofi Osei-Tutu Joins Bradford Edwards & Varlack LLP as Partner,” as downloaded from <https://bradfordedwards.com/john-kofi-osei-tutu-joins-bradford-edwards-varlack-llp-as-partner/>.
5. Attached hereto as **Exhibit 4** is a true and correct copy of a press release entitled “Mayor Adams Names Sheena Wright as First Deputy Mayor, Camille Joseph Varlack as Chief of Staff — Starting January,” as downloaded from <https://www.nyc.gov/office-of-the-mayor/news/881-22/mayor-adams-names-sheena-wright-first-deputy-mayor-camille-joseph-varlack-chief-staff-#/0>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 9, 2023.

/s/ Joseph M. Sanderson

JOSEPH M. SANDERSON